

REMARKS

Claims 1, 2, 4-27, 29 and 31-52 are pending in this application. Claims 1, 4, 6, 8-12, 14-15, 21, 23-24, 31-33, 35, 38-40, 43-45 and 48-52 have been amended, claims 53-57 have been added and claim 29 has been canceled without prejudice by the present Amendment. Amended claims 1, 4, 6, 8-12, 14-15, 21, 23-24, 31-33, 35, 38-40, 43-45 and 48-52 and new claims 53-57 do not introduce any new subject matter.

REJECTIONS UNDER 35 U.S.C. § 102

"A claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference." Verdegaal Bros. v. Union Oil Co. of California, 814 F.2d 628, 631, 2 U.S.P.Q.2d 1051, 1053 (Fed. Cir. 1987). "The identical invention must be shown in as complete detail as is contained in the . . . claim." Richardson v. Suzuki Motor Co., 868 F.2d 1226, 1236, 9 U.S.P.Q.2d 1913, 1920 (Fed. Cir. 1989); M.P.E.P. § 2131.

102 Rejections Based on Tranchina

Reconsideration is respectfully requested of the rejection of claims 1, 2, 4-27 and 31-52 under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent Application Publication No. 2002/0105507 ("Tranchina"), claim 29 having been canceled.

Claims 1, 2, 4-27, 31-37 and 52

Applicant respectfully submits that Tranchina does not disclose or suggest the at least one display that is capable of being mounted to the assembly housing at a mounting location in a first orientation and is removable to be remounted at the mounting location in a second orientation reversed from the first orientation, as recited in amended claims 1, 23 and 52.

The embodiments of claims 1, 23 and 52 recite a display that can be mounted at a location on the assembly housing in a first orientation, for example, as shown in Figs. 1 or 9, wherein the screen 131 faces a front side of the assembly housing 100. The display 130 can be removed and remounted at the same location on the assembly housing, but in a second orientation reversed from the first orientation, for example, as shown in Fig. 8, wherein the back side of the display 130 faces a front side of the assembly housing 100. See, e.g., page 15, lines 11-17.

These features are neither expressly nor inherently disclosed or suggested in Tranchina. Indeed, in contrast to the claimed embodiments, Tranchina shows a display that can only be mounted to the assembly housing in one orientation. The display 118 of Tranchina includes a connector 142 that mates with connector 120 on the assembly housing. Unlike the claimed embodiments, the display 118 cannot be turned around to be mounted in a second orientation because the connectors 142 and 120 would be on opposite sides and not match up. See Tranchina, Fig. 5, ¶ 0044. Accordingly, Tranchina teaches away from claimed display that can be mounted to the assembly housing in a first orientation and removed and remounted to the assembly housing in the second orientation.

Therefore, Applicant respectfully submits that independent claims 1, 23 and 52 are not anticipated by Tranchina. Claims 2 and 4-22 depend from claim 1, and claims 24-27 and 31-37 depend from claim 23, which, for the reasons stated hereinabove, are submitted not to be anticipated by the cited reference. For at least those very same reasons, claims 2, 4-22, 24-27 and 31-37 are also submitted not to be anticipated by the cited reference.

Applicant also notes that Tranchina fails to disclose a screen of the at least one display that faces a first side of the assembly housing in the first orientation and faces a second side of the assembly housing opposite the first side in the second orientation, as recited in claim 7, and a screen of the at least one display that faces a front side of the assembly housing in the first orientation and faces a rear side of the assembly housing in the second orientation, as recited in claim 35. As stated above, the display in Tranchina is not capable of such mounting and remounting to change the orientation thereof.

Accordingly, Applicant respectfully requests that the Examiner withdraw the rejection of claims 1, 2, 4-27, 31-37 and 52 under 35 U.S.C. § 102(e) and that claims 1, 2, 4-27, 31-37 and 52 are in condition for allowance.

Claims 38-51

Applicant respectfully submits that Tranchina does not disclose or suggest the first media player that is accessed via a first panel of the assembly housing, the second media player that is accessed via a second panel of the assembly housing adjacent the first panel, and the at least one display that is mountable to the assembly housing at a location between the first and second panels, as recited in amended claims 38 and 51.

Referring to Fig. 1, for example, the embodiments of claims 38 and 51 recite first and second media players 108 and 120 that are accessed via two respective panels of the assembly housing 100 that are adjacent to each other. Further, the display 130 is mounted to the assembly housing 100 between the first and second panels.

These features are neither expressly nor inherently disclosed or suggested in Tranchina. Indeed, Tranchina does not include any disclosure which speaks to the

positioning of multiple media devices in an assembly housing or to the positioning of a display device relative thereto.

Therefore, Applicant respectfully submits that independent claims 38 and 51 are not anticipated by Tranchina. Claims 39-50 depend from claim 38, which, for the reasons stated hereinabove, is submitted not to be anticipated by the cited reference. For at least those very same reasons, claims 39-50 are also submitted not to be anticipated by the cited reference.

Applicant also notes that Tranchina fails to disclose a bag that includes first and second openings for providing access to the first and second panels, respectively, without removing the assembly housing from the bag, as recited in claim 50. The bag in Tranchina only shows one opening at a top portion thereof. See Tranchina, Fig. 5.

Accordingly, Applicant respectfully requests that the Examiner withdraw the rejection of claims 38-51 under 35 U.S.C. § 102(e) and that claims 38-51 are in condition for allowance.

102 Rejections Based on Meritt

Reconsideration is respectfully requested of the rejection of claims 23-27, 32, 34, 35-48 and 50 under 35 U.S.C. § 102(b) as being anticipated by U.S. Patent No. 6,216,927 ("Meritt"), claim 29 having been canceled.

Claims 23-27, 32 and 34-37

Applicant respectfully submits that Meritt does not disclose or suggest the at least one display that is capable of being mounted to the assembly housing at a mounting location in a first orientation and is removable to be remounted at the mounting location in a second orientation reversed from the first orientation, as recited

in amended claim 23.

As explained above, the embodiment of claim 23 recites a display that can be mounted at a location on the assembly housing in a first orientation, for example, as shown in Figs. 1 or 9, wherein the screen 131 faces a front side of the assembly housing 100. The display 130 can be removed and remounted at the same location on the assembly housing, but in a second orientation reversed from the first orientation, for example, as shown in Fig. 8, wherein the back side of the display 130 faces a front side of the assembly housing 100. See, e.g., page 15, lines 11-17.

These features are neither expressly nor inherently disclosed or suggested in Meritt. First, Meritt does not show a display that is mounted and remounted at the same location in first and second orientations.

Second, Meritt does not show a display which is mounted to an assembly housing supporting the media player. In stark contrast, Meritt shows a display 16 that is positioned in a case 2 which attaches to an upper portion 58 of a case 1. See Meritt Fig. 4, col. 6, lines 61-66.

The Examiner incorrectly maintains that the entire mounting system 50 shown in Meritt is an assembly housing. See Office Action at 5. This analogy is incorrect and represents a fundamentally unfair interpretation of the reference. The claimed assembly housing is shown, for example, by reference numeral 100 in Fig. 1 of Applicant's disclosure. See, e.g., page 10, lines 1-3. Accordingly, Applicant respectfully submits that the electronic signal generating device 3 of Meritt is more appropriately analogized to the assembly housing (see col. 5, lines 29-35; Fig. 1) and that it is clear that the display 16 is not mounted to the electronic signal device 3.

The Examiner's conclusion that the mounting system 50 is an assembly housing is akin to a statement that the bag 200, including the straps attached thereto, shown, for example, in Fig. 11 of Applicant's disclosure, is an assembly housing. However, as further defined in the claims, the assembly housing 100 is able to be positioned in the bag 200 so that the assembly housing may be mounted to a seat by the bag. In contrast, under the Examiner's strained and unreasonable interpretation, the mounting system 50 of Meritt includes the case 1 (which the Examiner analogizes to the bag) as a component thereof. However, the claimed assembly housing clearly does not include the bag as a component and is, instead, positioned in the bag.

Accordingly, Meritt does not disclose or suggest the claimed display that can be mounted to the assembly housing in a first orientation and removed and remounted to the assembly housing in the second orientation.

Therefore, Applicant respectfully submits that independent claim 23 is not anticipated by Meritt. Claims 24-27, 32 and 34-37 depend from claim 23, which, for the reasons stated hereinabove, is submitted not to be anticipated by the cited reference. For at least those very same reasons, claims 24-27, 32 and 34-37 are also submitted not to be anticipated by the cited reference.

Applicant also notes that Meritt fails to disclose a screen of the at least one display that faces a first side of the assembly housing in the first orientation and faces a second side of the assembly housing opposite the first side in the second orientation, as recited in claim 7, and a screen of the at least one display that faces a front side of the assembly housing in the first orientation and faces a rear side of the assembly housing in the second orientation, as recited in claim 35. As stated above, the display

in Meritt is not mounted to an assembly housing and is not mounted and remounted at the same location in first and second orientations.

Accordingly, Applicant respectfully requests that the Examiner withdraw the rejection of claims 23-27, 32 and 34-37 under 35 U.S.C. § 102(b) and that claims 23-27, 32 and 34-37 are in condition for allowance.

Claims 38-48 and 50

Applicant respectfully submits that Meritt does not disclose or suggest the first media player that is accessed via a first panel of the assembly housing, the second media player that is accessed via a second panel of the assembly housing adjacent the first panel, and the at least one display that is mountable to the assembly housing at a location between the first and second panels, as recited in amended claim 38.

As stated above, the embodiment of claim 38 recites, for example, first and second media players 108 and 120 that are accessed via two respective panels of the assembly housing 100. The panels are adjacent to each other and the display 130 is mounted to the assembly housing 100 between the panels.

These features are neither expressly nor inherently disclosed or suggested in Meritt. As stated above, Meritt does not disclose a display that is mounted to an assembly housing. Further, Meritt does not include any disclosure which speaks to the positioning of multiple media devices in an assembly housing or to the positioning of a display device relative thereto.

Therefore, Applicant respectfully submits that independent claim 38 is not anticipated by Meritt. Claims 39-48 and 50 depend from claim 38, which, for the reasons stated hereinabove, is submitted not to be anticipated by the cited reference.

For at least those very same reasons, claims 39-48 and 50 are also submitted not to be anticipated by the cited reference.

Accordingly, Applicant respectfully requests that the Examiner withdraw the rejection of claims 38-48 and 50 under 35 U.S.C. § 102(b) and that claims 38-48 and 50 are in condition for allowance.

REJECTIONS UNDER 35 U.S.C. § 103(a)

103 Rejections Based on Meritt

Reconsideration is respectfully requested of the rejection of (1) claims 1, 4, 5, 7-22, 33, 49, 51 and 52 under 35 U.S.C. § 103(a) as being unpatentable over Meritt; and (2) claims 2 and 31 under 35 U.S.C. § 103(a) as being unpatentable over Meritt in view of U.S. Patent No. 6,409,242 ("Chang").

Claims 1, 2, 4, 5, 7-22, 33, 49 and 52

Applicant respectfully submits that Meritt, when taken alone or in combination with Chang, fails to teach or suggest the at least one display that is capable of being mounted to the assembly housing at a mounting location in a first orientation and is removable to be remounted at the mounting location in a second orientation reversed from the first orientation, as recited in amended claims 1, 23 and 52.

As stated above, Meritt does not disclose or suggest these features. Further, it would not be obvious to modify Meritt to include the recited features.

*The claimed embodiments are not
rendered obvious by a "swivel screen"*

The Examiner maintains that a "media player with a swivel screen is well-known and widely used in the art, and therefore it would have been obvious . . . to modify Meritt by mounting the display in a first position and a second position reversed from the

first position (180 degree rotating screen)".

By this statement, the Examiner illustrates a fundamental misunderstanding of the claimed embodiments. Applicant respectfully submits that claims 1, 23 and 52 as amended, and claim 52 as previously presented, do not recite a "swivel screen". In contrast, claims 1, 23 and 52 recite a display that is removed and remounted in a second orientation opposite the first orientation. Therefore, the range of viewing angles is greater than that of a "swivel screen"/"180 degree rotating screen". The display of the claimed embodiments provides viewing angles from both sides of the device (e.g., from the front and behind the display device), whereas a "180 degree rotating screen" only provides viewing from one side.

Chang does not disclose or suggest a display that is removed and remounted in a second orientation opposite a first orientation

Applicants note that the addition of Chang does not render the claimed features obvious. Chang does not disclose a display that is removed and remounted in a second orientation opposite the first orientation. The display 22 in Chang remains fixed to the housing 24. Furthermore, the range of motion of the display in Chang is limited such that a viewer behind the device (i.e., facing the back of the display) cannot view the display. See Chang col. 2, lines 15-17; Fig. 8 (showing that the display 22 is limited to 90° rotation around the second axis). In contrast, the display of the claimed embodiments is removed and remounted to the assembly housing so that the screen can be viewed from opposite sides of the device. Therefore, Chang does not provide any disclosure or suggestion to develop the claimed embodiments.

Meritt cannot be modified to include a display that is removed and remounted to an assembly housing in a second orientation opposite a first orientation

Applicant respectfully submits that modifying Meritt to include the display of claims 1, 23 and 52 is not obvious because such a modification would unduly change Meritt's principle of operation. If the proposed modification or combination of the prior art would change the principle of operation of the prior art invention being modified, such that the modification "would require a substantial reconstruction and redesign of the elements shown in the primary reference", then the teachings are not sufficient to render the claims *prima facie* obvious. In re Ratti, 270 F.2d 810, 813, 123 USPQ 349, 352 (CCPA 1959); see MPEP § 2143.01.

As stated at length above, Meritt does not disclose a display that is attached to the assembly housing as claimed. In contrast, the display 16 of Meritt is positioned in a case 2, which, in turn, is mounted to a case 1. A substantial redesign would be required to mount the display in Meritt to, for example, the signal generating device 3, which, for purposes of argument, is analogous to the assembly housing.

Furthermore, the case 2 is designed to be mounted in the case 1 to face viewers in one direction only. The case 2 is not designed to be removed and remounted in the case 1 in a different orientation. Such a modification would require a substantial redesign of Meritt.

Therefore, it is respectfully submitted that the cited references, when taken alone or in combination, do not disclose or suggest the embodiments of the present invention, as defined in amended claims 1, 23 and 52, and that it would not have been obvious to modify Meritt alone or in view of Chang, to develop same.

As such, Applicant respectfully submits that the embodiments of the invention as defined in amended claims 1, 23 and 52 are patentable over Meritt alone and in view of Chang. For at least the reason that claims 2, 4, 5 and 7-22 depend from claim 1, and claims 33 and 49 depend from claim 23, claims 2, 4, 5, 7-22, 33 and 49 are also submitted to be patentably distinct over the cited references.

Accordingly, Applicant respectfully requests that the Examiner withdraw the rejection of claims 1, 2, 4, 5, 7-22, 33, 49 and 52 under 35 U.S.C. § 103(a) and that claims 1, 2, 4, 5, 7-22, 33, 49 and 52 are in condition for allowance.

Claim 51

Applicant respectfully submits that Meritt fails to teach or suggest the first media player that is accessed via a first panel of the assembly housing, the second media player that is accessed via a second panel of the assembly housing adjacent the first panel, and the at least one display that is mountable to the assembly housing at a location between the first and second panels, as recited in amended claim 51.

As stated above, Meritt does not disclose or suggest these features. Further, it would not be obvious to modify Meritt to include the recited features.

These features are neither expressly nor inherently disclosed or suggested in Meritt. As stated above, Meritt does not disclose a display that is mounted to an assembly housing. Further, Meritt does not include any disclosure which speaks to the positioning of multiple media devices in an assembly housing or to the positioning of a display device relative thereto.

Therefore, it is respectfully submitted that Meritt does not disclose or suggest the embodiment of the present invention, as defined in amended claim 51, and that it would

not have been obvious to modify Meritt to develop same.

As such, Applicant respectfully submits that claim 51 is patentable over Meritt. Accordingly, Applicant respectfully requests that the Examiner withdraw the rejection of claim 51 under 35 U.S.C. § 103(a) and that claim 51 is in condition for allowance.

103 Rejections Based on Adams

Reconsideration is respectfully requested of the rejection of (1) claims 1, 2, 10-12, 14-17 and 51 under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 6,380,978 (‘Adams’); and (2) claim 13 under 35 U.S.C. § 103(a) as being unpatentable over Adams in view of Meritt.

Claims 1, 2, 10-12 and 14-17

Applicant respectfully submits that Adams fails to teach or suggest the at least one display that is capable of being mounted to the assembly housing at a mounting location in a first orientation and is removable to be remounted at the mounting location in a second orientation reversed from the first orientation, as recited in amended claim 1. Further, it would not have been obvious to modify Adams, when taken alone or in combination with Meritt to develop same.

These features are neither expressly nor inherently disclosed or suggested in Adams. The display in Adams is integral with the housing 12, and accordingly is not mounted or removable to be remounted thereto. Indeed, such a configuration would require a substantial reconstruction of Adams, and is, therefore, not obvious.

Further, as stated above, Meritt does not disclose nor render obvious the claimed features.

Therefore, it is respectfully submitted that Adams, when taken alone or in

combination with Meritt does not disclose or suggest the embodiment of the present invention, as defined in amended claim 1, and that it would not have been obvious to modify Adams when taken alone, or in view of Meritt, to develop same.

As such, Applicant respectfully submits that claim 1 is patentable over Adams alone and in view of Meritt. For at least the reason that claims 2, 10-12 and 14-17 depend from claim 1, claims 2, 10-12 and 14-17 are also submitted to be patentably distinct over the cited references.

Accordingly, Applicant respectfully requests that the Examiner withdraw the rejection of claims 1, 2, 10-12 and 14-17 under 35 U.S.C. § 103(a) and that claims 1, 2, 10-12 and 14-17 are in condition for allowance.

Claim 51

Applicant respectfully submits that Adams fails to teach or suggest the first media player that is accessed via a first panel of the assembly housing, the second media player that is accessed via a second panel of the assembly housing adjacent the first panel, and the at least one display that is mountable to the assembly housing at a location between the first and second panels, as recited in amended claim 51.

These features are neither expressly nor inherently disclosed or suggested in Adams. Adams does not include any disclosure which speaks to multiple media devices in an assembly housing or to the positioning of a display device relative thereto.

See col. 5, lines 22-35; Figs. 1A, 1B (disclosing a single DVD player).

Therefore, it is respectfully submitted that Adams does not disclose or suggest the embodiment of the present invention, as defined in amended claim 51, and that it would not have been obvious to modify Adams to develop same.

As such, Applicant respectfully submits that claim 51 is patentable over Adams. Accordingly, Applicant respectfully requests that the Examiner withdraw the rejection of claim 51 under 35 U.S.C. § 103(a) and that claim 51 is in condition for allowance.

NEW CLAIMS

Applicant respectfully submits claims 53-57 for consideration. Applicant respectfully submits that new claims 53-57 are patentable over the cited references for at least the reason of their dependency on independent claims 1, 23 or 52, which Applicant submits are in condition for allowance.

An early and favorable reconsideration is earnestly solicited. If the Examiner has any further questions or comments, the Examiner may telephone Applicant's Attorney to reach a prompt disposition of this application.

Respectfully submitted,



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